

August 31, 2022

Via Email (CronanNYSDChambers@nysd.uscourts.gov)

The Honorable John P. Cronan
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: Diocese of Rockville Centre v London Market Insurers, No. 21-cv-00071 (JPC)

Dear Judge Cronan:

This letter is submitted jointly by plaintiff The Roman Catholic Diocese of Rockville Centre, N.Y. (the "Diocese") and defendants Certain Underwriters at Lloyd's London and Certain London Market Companies ("LMI") pursuant to the Court's Minute Entry on July 13, 2022, ordering the parties to submit a joint status letter updating the court on the status of the disclosure dispute and whether the parties consider the dispute resolved.

By letter dated June 30, 2022, the Parties informed the Court that the Diocese had provided some additional information and LMI requested time to review this production. The parties have since held in person mediation sessions on July 18, August 10, and August 11, 2022.

During the review of the 62,028 documents produced in June, LMI determined that the issue of over redacting once again prevented LMI from reviewing and analyzing certain claim specific files and alleged perpetrators' health records, despite this issue having been resolved in part in prior productions. LMI raised this issue during the July 18th mediation session and then again in an email dated August 4, 2022. LMI have not received a substantive response. Also, in the email sent on August 4, 2022, LMI requested a response to requests for certain information and certain IRCP related information that LMI previously requested; some of these requests remain outstanding.

The Diocese disagrees with LMI's contention that any documents produced by the Diocese were over-redacted. All documents produced to LMI by the Diocese have been redacted in accordance with a protective order from the United States Bankruptcy Court that *requires* the Diocese to redact certain personally identifiable information and personal health information from any document it produces in connection with the bankruptcy case. Separately, the Bankruptcy Court has approved a process for the Diocese to *remove* certain redactions for documents it provides to parties in *mediation*. The Diocese is in the process of preparing mediation copies of the approximately 60,000 recently produced documents, with fewer redactions, and they will be produced to all mediation parties shortly. With respect to LMI's other information requests, including requests for additional IRCP information, the scope and form of IRCP information that will be made available to mediation parties remains under discussion as part of the mediation process.

The Parties will continue their efforts to resolve the disclosure disputes. The Parties jointly ask that they be permitted to report back to the Court by October 27, 2022.

Very truly yours,

/s/John B. Berringer

John B. Berringer

Reed Smith LLP

/s/ Catalina Sugayan

Catalina Sugayan

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